

United States District Court
544 King Street
Wilmington, Delaware 19801

Jourdean Lorah - Plaintiff
114 Walls Ave.
Wilmington, Delaware 19805

Case Number - 1:06-CV-539 SLR

V

Department of Natural Resources - Defendant
and Environmental Control
89 King's Highway
Dover, Delaware 19901

PMA Management Corp. Defendant
P.O. Box 25249
Lehigh Valley, Pennsylvania 18002-5249

FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE
2007 APR 16 PM 2:49

MOTION TO AMMEND MOTION TO DISMISS

Plaintiff Jourdean Lorah respectfully prays that The United Sates District Court considers the following amended motion. Plaintiff, Jourdean Lorah is presently unemployed with no representatiou concerning the discrimination and the damages regarding her property and her career. Currently, the Plaintiff has damages concerning her auto which was recently repaired. Plaintiff's auto has not been repaired properly and water damage is now present. Plaintiff does not have any income except for fifty dollars a week from unemployment. Plaintiff's account will be exhausted in a few weeks. There are no job openings and the Plaintiff has no career or retirement. The state agencies have failed to administrate the Plaintiff's

Jourdean Lorah

discrimination claims regarding gender, age and disability. Plaintiff, has been denied the due process of those administrative agencies who investigate and charge for violations of discrimination. Plaintiff is often harassed regarding the gender (Jordan Lorah). Misapprehension of the law has resulted in financial extortion regarding the Plaintiff's present situation regarding the Defendants (Turnbill V Fink Del. Supr., 668 a 2D 1370 (1995).) The following statement of facts were submitted to the United States District Court and The Plaintiff has proved her case, Tofoya V Adams (DC Colo) 612 F Supp 1097, 78 ALR Fed 477.

No one from The Department of Labor (Industrial Affairs) in Wilmington, Delaware has assigned the Plaintiff's claim of discrimination to an investigator. Plaintiff is considerably older, degreed and highly skilled. Senator, Joseph Biden was notified approximately two years ago. Frank Inzeo was also notified at the main field office in Washington, D.C. of The Equal Employment Opportunity Commission. It is unlawful to intentionally discriminate, neglect the present situation regarding Title VII and the chemical whiff which has resulted in harm. Plaintiff, Jourdean Lorah has the right to equal opportunity. The need to manage a home and to take care of a senior is far, more important than someone else's entertainment, dishonesty or greed. The Human Relations Board has also violated the Plaintiff and has done nothing to remedy the relations which continue to disseminate false information or defame the Plaintiff. Plaintiff, Jourdean Lorah respectively prays that the case be assigned to appointed counsel and that a trial date be scheduled. Plaintiff, Jourdean Lorah is not a man or a prisoner and the current status is financial extortion.

Statement Of Facts

1. Plaintiff, Jourdean Lorah is presently on welfare and is financially poor.

Plaintiff, provided all of the necessary documentation concerning her welfare status.

Plaintiff, is currently receiving an unemployment check for fifty dollars, but it is not enough to pay the bills or manage a home. Plaintiff, does not have any retirement.

Plaintiff would like charges filed against those involved in the financial extortion of her mother's home. Plaintiff, has been marked by her neighbors who have communicated wrongfully outside of her mother's home. Cigarette butts and dog feces is often on the lawn. Plaintiff, does not have a pet nor does she smoke cigarettes. The New Castle County police were notified. Plaintiff's car was recently broke into. The violation was reported to a police officer who has assigned a number to the report.

2. Plaintiff, has recently received a letter from The Department of Labor (Julie Cutler) concerning her claim of discrimination. Ms. Cutler has failed to assign the claim to an investigator as she continues to violate the Plaintiff. The former employer is dishonest and the former employer has no reason except for excuses concerning the high school students that are involved with the conspiracy. Plaintiff is considerably older and it is discrimination. The discrimination has been a continuing violation for five years in the state of Delaware involving the gender of Jordan Lorah and the Plaintiff, Jourdean Lorah. A computer print out from the DMV in Washington, D.C. verifies that Jordan Lorah was in their computer as well. Plaintiff, Jourdean Lorah has verified that Jordan Lorah did not live at 1618 Carlin

Lane in McLean, VA. Plaintiff, Jourdean Lorah gave he services as a nanny in lieu of rent.

3. Plaintiff, Jourdean Lorah is still awaiting for her motion of affirmative action to be granted. Plaintiff is a single forty eight year old woman. Plaintiff provided the court with this documentation. Plaintiff, has also provided the court with documentation regarding her health. The RX list shows no medication prescribed for a contagious illness. See the following Rx list which verifies that the Plaintiff is not contagious, but the communication regarding the extortion of marriage/divorce is the invasion of privacy and it violates the Plaintiff's rights.

4. Plaintiff, Jourdean Lorah presently has damages concerning her auto which needs to be repaired. Plaintiff, does not have a car that is operating properly. Water damage is present and the damages have not yet been assessed.

5. Plaintiff, Jourdean Lorah has a right to her education under Federal Law without the harassment of her fellow colleagues and instructors. The gender, age and disability discrimination is on the campus and it is a huge distraction reharding the Math Lab and testing. Plaintiff's test scores are high, but they are higher when the test is taken in the lab when there are no students (noise, harassment and discrimination). Plaintiff's last score was 100 (April 10, 2007-Spring Vacation). A complaint was filed with Public Safety, the dean and the dean of instruction. The claim was neglected.

6. Plaintiff, respectively prays for appointed counsel to end the dispute regarding a ban that keeps the Plaintiff unemployed and financially without any way to make a living. The law simply says that if you have been arrested that you will be appointed counsel. Plaintiff, Jourdean Lorah has not been arrested or charged for any crime. Plaintiff, Jourdean Lorah is denied equal opportunity and the right to be left alone. The ban in the form of a man which discriminates against a female is unlawful.

7. Plaintiff, Jourdean Lorah is the person who complained about the chemical whiff to DNREC. All written complaints were provided to the court. PMA management is now crossing out the address of the Plaintiff's former address in Sussex County, Delaware. Plaintiff, Jourdean Lorah spoke to PMA management on the phone about the fraud. Plaintiff has also verified with the state police that there is no man matching the social security on PMA 's claim. The state police officer told the Plaintiff, that it s a female in her computer, but it does not match the Plaintiff's social security.

8. Plaintiff, Jourdean Lorah respectively prays that her request for relief/ settlement out of court be granted. The damages are no career, no retirement, no place to live without employment and defamation regarding her name. Plaintiff's name is worthy and is highly skilled. Plaintiff, refuses the use of her name with companies who put her at risk or jeopardy for a loss that she did not cause. Plaintiff, will be filing another brief concerning the clip from the Washington Daily (Martin Luther King Library). The historical document is not to be used by others who are wrongfully prospering, thus leaving the Plaintiff, Jourdean Lorah with nothing.

**WILMINGTON POLICE DEPARTMENT
VICTIMS' BILL OF RIGHTS INFORMATION FOR
CRIME VICTIMS (KEEP THIS INFORMATION)**

CASE NUMBER 30-07-25709

**You can pick up a copy of this report at
the Wilmington Police Dept. (300 N
Walnut St.). If you need to add
information call 654-5151, and provide
the original case number. For Traffic
related reports call Records at 576-3607.**

OFFICER Ledezma

You have the right to hear about and take part in all
major stages of the criminal case. Therefore you
must make sure that the police and prosecutors
always have your correct current address.

JOSEPH R. BIDEN, JR.
DELAWARE

201 RUSSELL SENATE OFFICE BUILDING
WASHINGTON, DC 20510-0802
(202) 224-5042
www.senate.gov/~biden

United States Senate

JUDICIARY COMMITTEE
SUBCOMMITTEE ON
CRIME, CORRECTIONS AND VICTIMS' RIGHTS
RANKING MEMBER
FOREIGN RELATIONS COMMITTEE
RANKING MEMBER
CAUCUS ON INTERNATIONAL
NARCOTICS CONTROL
CO-CHAIRMAN

January 14, 2004

Ms. Jourdean Lorah
Route 5, Box 150-318
Frankford, DE 19945

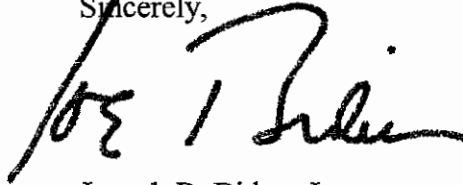
Dear Ms. Lorah:

Thank you for your recent letter regarding your issues in the workplace. The rights of employees to be free from discrimination in their compensation is protected under several laws, including the Equal Pay Act of 1963 and Title VII of the Civil Rights Act of 1964, both of which you have mentioned in your letter.

Employees who believe they are under compensated because of their race, color, religion, sex, national origin, age or disability may file a charge with the U.S. Equal Employment Opportunity Commission. You can contact the EEOC district office in Philadelphia by calling 215-440-2600. In addition, if you are seeking legal counsel and cannot afford an attorney, may I suggest that you contact the Community Legal Aid Society at 302-856-0038.

Again, thank you for contacting my office and I am hopeful that the information I have provided in this letter will assist you with any legal issues or questions.

Sincerely,



Joseph R. Biden, Jr.
United States Senator

01-21 WASHINGTON D.C. 09/16/93 05:31PM PAGE 1
 ALL DETAIL VA IVG493 02/04/93 C JORDAN LORAH
 PARK 1618 CARLIN LN.

MCLEAN VA 22101
 TOTAL DUE \$.00

TICKET NBR ISSUED MAKE STAT VIOL COLL PENLTY PAID DUE HEAR/LTR DISP
 744794260 02/04/93 TOYT J P025 \$20 \$0 \$0 \$0 04/22/93 24*

M O R E

PF KEY: 1 3 5 7 8 10 11 12 A-ADJ H-HEAR D-DIS C-CORR
 FUNC HELP END ADD TOP FWRD LEFT RIGHT COMPLETE P-PAY S-SUSP X-DEL M-MET

This person has been in jail for six years. This is not my tag number or my
 name. I was living at this address and the enclosed business reference verifies
 my position at this time.

Cora Yamamoto
1618 Carlin Lane
McLean, Virginia 22101

September 20, 1993

To whom it may concern:

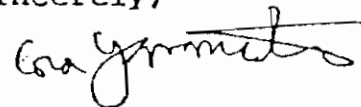
Jourdean S. Lorah provided child care and mother's helper services for my family in our home from July 1992 to September 1993. My daughters are now three and a half and seven and a half years old.

She was available most weeknights from 5:45 p.m. and assisted us with dinner, bath-time, and putting the children to sleep as well as entertaining the children and tidying-up their play areas. She provided these services occasionally on weekends. Ms. Lorah also provided this care when I and or my husband could not be home until later in the evening.

Ms. Lorah was reliable, efficient, and liked by my daughters, particularly the younger one. She demonstrated much creativity with crafts and art projects that the girls enjoyed and learned from.

Please feel free to contact me if you need additional information. I can be reached during the day at: (202) 224-7470.

Sincerely,



Cora Yamamoto

EXHIBIT 3

SEALED DOCUMENT

orah,jourdean,sarah 19590127

NAME LAST@FIRST@MIDDLE@SUFFIX	SEX	DOB	HT	WT	RECENT EYES	ADDED SS#
LIC #						
MULTI NAME/MESSAGE						
REPORT STATE MARYLAND		01 OF 01	PURGED D			
LORAH@JOURDEAN@SARAH		19590127			000000	890520
L600443758072	U	502	110	XXX	000000000	

UPDATE ACTION/DATE	DISC	ADDED	REV	RSN	E/R DATA
01 DELETED	900427 900915	890520	880914	DI	R 900416

DISCLOSURES:
091590 51 VIRGINIA

ENTER:
'DISCLOSE' 'DELETE NN' 'RECIND NN' 'CHANGE NN' 'RESTORE NN' 'PRINT' OR 'EXIT':
exit

***ENTER FULL NAME & BIRTHDATE & SEX (LAST@FIRST@MIDDLE YYYYMMDD S) OR 'END':

== <==> NTS3270@NTSBAN02

LU002

THE WASHINGTON DAILY NEWS MONDAY, MARCH 14, 1965



BALMY DAY—Everybody was outdoors yesterday, drawn by the balmy 65-degree weather. These scenes, taken more or less at random, were shot in the Northwest Washington vicinity of Glover-Archbold Park. Trying to gain speed, and balance, at left is a 7-year-old named Jody. The reading couple at center (he's reading "The King Must Die") might have had better seats inside, but they'd have missed the nice day. Winding up spring training at right are Neal Gold (left) and Bret Johnson, both 13. This week will be similarly warm, the Weather Bureau said, with springlike showers.

—News Photos by Geoffrey Gilbert

Business Support Expected

Boycotters Head for 14th-st

The Free D. C. Movement, claiming victory on 11-st, shifts its home rule drive to the 14th-st nw area between U-st and Park Road this week.

Rev. William A. Wendt, president of the University Neighborhoods Council, who will head the drive in the new area, said today the first meeting to organize will be held tomorrow.

MEETING

The meeting tomorrow will call together representatives of area civic groups including the Upper Cardozo Men's Club, and the University Neighborhood Council.

"I think that quite a few of the merchants up here will line up with us, and against the opposition of the Board of Trade," Dr. Wendt said.

Dr. Wendt said that after organizational meetings are held this week he is hopeful that the drive will get underway "immediately." As was the case in the 11-st area, people will be urged to shun storeowners who refuse to display a "Free D.C." sticker.

George Freedman, president of the Columbia Heights Businessmen's Association, an organization of 30 merchants in the 14th-st area, said members

of the Association hadn't been polled about the drive.

"I can only speak for myself," he said. "I'm for it. I imagine many others will be, too."

The boycott of the 11-st area wound up Saturday when 200 supporters of the Free D.C. Movement staged a "victory march" up 11-st in Northeast in the 13-block area where the drive was centered.

Meanwhile, the Movement remains at loggerheads with the NAACP over the boycott.

Movement leader Marian Barry said it was unfortunate that the NAACP was

not supporting the Freedom Movement and that "quite frankly I don't understand their reason. NAACP officials attended all of the early meetings of the movement and should have understood what the movement was doing."

ANSWER

Yesterday the NAACP's national director, Roy Wilkins, speaking at a membership drive at Metropolitan Baptist Church, claimed that the boycott was a futile effort.

"It's an error to think if you make a corner merchant sign up, it will bring about home rule. Home rule is made in Congress," Mr. Wilkins said.

And D.C. Democratic Chairman Joseph L. Rauh told a Unitarian workshop for religious liberals that boycotting merchants who refuse to back home rule is a "terrible blunder," but Congress, he added, is to blame for creating the situation that brought it about.

"Whom are we to condemn?" he asked. "Those who wanted justice or those who have denied our aspirations?"

What Goes on Here

D. C. Crime Up 13 Per Cent

The District had a total of 2781 serious crimes last month, a 13.6 per cent increase over February, 1965, police reported today. It was the 46th month in a row that crime has risen here.

There were decreases only in housebreakings and auto thefts, of 6.5 and 12.9 per cent, respectively. Biggest increase was in petty larcenies, which jumped 352 cases or 59.7 per cent.

Murders were up 4 or 46 per cent; rapes 4 or 33 1/3 per cent; robberies 15 or 4.8 per cent; aggravated assaults 45 or 2.78 per cent; and grand larcenies 25 or 20.2 per cent. Police "clearance" of crimes was down from 38.5 per cent in February, 1965, to 36.1 per cent last month.

Navy Yard for GPO?

The District Commissioners are considering a proposal to the National Capital Planning Commission that the Navy Yard, in Southeast Washington, be designated as the site for a new Government Printing Office. The Commissioners' delegate abstained earlier this month in an NCP vote to rescind previous action placing GPO on the National Training School site, thus defeating the move.

Crash Kills Md. Man

Joseph C. Roswell, 67, of 7015 Freepoint-st, Hyattsville, was fatally injured Saturday when his car hit a tree on Minnesota-av. His death was the 21st this year in D. C. traffic, last year the toll at this time was 22.

Poverty War—"Fiddling Around?"

Civil rights organizer Bayard Rustin, speaking here at the Church of the Redeemer said the War on Poverty amounts to "fiddling around with little projects . . . 79 per cent of which have been done for the last 200 years." He said job training is foolish. "You can't train any segment of the population unless there's a demand for work." He suggested massive federal public works projects.

Brewster Raps FAA

Sen. Daniel Brewster (D., Md.) charged that the Federal Aviation Agency is afraid to hold public hearings on allowing jets at National Airport. The roar of jets he added, would spoil the Watergate Concerts, the Sylvan Theater's Shakespeare program, the Cherry Blossom Festival and maybe even the Fourth of July fireworks at the Washington Monument.

Hot Shoppes Robbed—Again

The Hot Shoppes restaurant at Fourth-st and Florida-av. ne was held up early yesterday for the second time in less than a week. Early last Monday a loose bandit got \$2400. Yesterday two bandits walked in the back door, left open for trash removal, put a gun to the head of manager Ann Michael, 25, forcing him to open the safe, which yielded them \$1700.

Va. Assembly Stops Clock

RICHMOND, March 14 (AP) — The 1966 session of the Virginia General Assembly was history today, but on Sept. 1 its action will become very evident.

On that date, a 2 per cent state sales tax will go into effect as will a 2 per cent motor vehicle excise tax. All present city sales taxes will stop, but both counties and cities will be able to add a 1 per cent tax to the state levy.

The state sales tax, signed into law Saturday by Gov. Mills E. Godwin Jr., will jump to 3 per cent in 1968.

The Assembly was forced to stop the clocks 15 minutes before the midnight deadline Saturday for the 60-day session. Final adjournment did not come until 4:13 a.m. Sunday in the Senate, one minute after House adjournment.

Hearings Open on Colleges for D. C.

'The C Student Is More Important'

Sen. Wayne Morse (D., Ore.) struck a blow for the C student today as his District Education subcommittee opened hearings on legislation establishing public colleges here.

"I am not at all interested in supporting a higher education program in this city that is going to be limited to the so-called superior student," he told a standing-room-only audience in a 25-minute introductory statement.

"The C student is more important in the educational system because there are so many of them. Raising entrance requirements to college, in my judgment, is immoral because that is sacrificing human value."

2 SCHOOLS

His bill would establish a two-year public community college and a four-year public college of arts and sciences planned and operated by a Higher Education Board.

Sen. Morse pointed out that by 1979, when present first graders are graduating from high school, "over 60 per cent of all employment opportunities will be in professional, man-

agerial or skilled technical occupations" requiring higher education.

Sen. Margaret Chase Smith (R., Me.), in supporting the bill, said that only in the District are there no programs for

strengthening public higher education.

Peter S. Muirhead, Associate Commissioner for higher education in the U. S. Office of Education, pledged help in developing the proposed public colleges.

Integration Called Traffic Hazard

Casto Raps School Board Head

Arlington County Board member Harold J. Casto today accused the chairman of the County School Board of "deliberately deceiving" parents by withholding letters from police warning of traffic dangers to children. If the chairman's plan for integrating six North Arlington elementary schools is carried thru,

Mr. Casto released two letters, dated March 4 and 10, from Police Chief William G. Flawler which said that three Globe Road intersections are so dangerous that children should be "transported by bus" rather than cross them.

Mr. Casto said about 100

children would have to cross Globe Road to reach Langston School under School Board Chairman John Reed Spicer's integration plan.

Mr. Casto said he was "shocked" that Mr. Spicer didn't show the March 4 letter to advisory committees from the six schools that met on March 4. He said he was releasing both of them so the public would have the information before the final school board meeting on the subject Thursday.

Mr. Casto said Mr. Spicer's letter "entirely the March 4 meeting said: 'county traffic

officials are working out tentative plans to assure the safety of any children who would cross Globe Road to attend Langston."

He said this is "the type of deception we might expect at the school-boy level but totally unworthy of a school board chairman."

He charged Mr. Spicer with concealing the letters' second time in newspaper statements Saturday that his plan would require "substantially less busing" than two others under consideration.

CERTIFICATE OF SERVICE

On this day APRIL 16, 2007, that all documents
were either sent or delivered to the Defendants.

**Department of Natural Resources
and Environmental Control
89 King's Highway
Dover, Delaware 19901**

**PMA Management Corporation
P.O. Box 25249
Lehigh Valley, Pennsylvania 18002-5249**

**Jennifer Hurvitz Burbine (#4416)
824 North Market Street Suite 902
P.O. Box 709
Wilmington, DE. 19899-0709**

**Dept. Of Justice
Robert Phillips
820 N. French Street 6th. Floor
Wilmington, DE. 19801**

A handwritten signature in cursive script, appearing to read "Judean Lora", is written in black ink.